UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

In re: YOAN HENRIQUEZ,		Chapter 13 Bankruptcy
	Debtor	Bankruptcy No.: 20-12166PMM

CERTIFICATE OF NO RESPONSE

- I, Pauline Felice Gibble, Esquire, of Saxton & Stump, attorney for Debtor, hereby certify that:
- (1) Adequate notice of the Motion to Deny Confirmation of Chapter 13 Plan, Convert Chapter 13 Case to Chapter 11, Grant Debtor Leave to Proceed as a Small Business Debtor Under Subchapter V of Chapter 11 and Extend Deadlines ("Motion") was served upon the Chapter 13 Trustee, United States Trustee, and all creditors and parties in interest; and
 - (2) I have received no Response to the Motion; and
- (3) Neither the Trustee, nor the United States Trustee, nor any creditor or party in interest have filed a Response to the Motion within the time set by the Court.

WHEREFORE, Saxton & Stump respectfully requests that this Honorable Court grant the Motion without a hearing and that an Order be entered granting the relief requested.

Date: June 18, 2021 Respectfully submitted, Saxton & Stump

By: <u>/s/ Pauline Felice Gibble</u>
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